

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, JR.,

Defendant.

Crim. No. 1:18-cr-83 (TSE)

Trial Date: July 31, 2018

GOVERNMENT’S MOTION FOR LEAVE TO FILE

The United States of America, by and through Special Counsel Robert S. Mueller, III, seeks leave of the Court to file its response to the defendant’s Second Supplemental Motion *In Limine* (Doc. 153) by 5 p.m. on Monday, July 30, 2018.¹ Defendant’s second supplemental motion seeks to exclude over 50 exhibits, which total over 470 pages. *See* Doc. 153 at 2-6.

At the motions hearing held on July 23, 2018, and in an Order entered on July 24, 2018, the Court directed the defendant to file, by 5:00 p.m. on July 26, 2018, a supplemental memorandum identifying the specific government trial exhibits that he seeks to preclude. *See* Doc. 150 at 3; 7/23/2018 Tr. 53-54. The Court stated that, if the defendant’s supplemental memorandum involved only “a few” exhibits, the government was to respond within 24 hours—that is, by 5:00 p.m. on Friday, July 27. 7/23/2018 Tr. 53-54. The Court further provided that, “if defendant identifies a significant number of exhibits in his supplemental memorandum and the government requires additional time to respond,” the government could file its response by 5:00 p.m. on July 30, and “should notify the Court promptly.” Doc. 150 at 3; 7/23/2018 Tr. 54. Accordingly, because

¹ To the extent possible given the timing of jury selection and trial, the government will endeavor to file its motion before Monday.

the defendant has identified more than 50 exhibits to exclude, the government requests permission to file its response no later than 5:00 p.m. on Monday, July 30, 2018.

CONCLUSION

For the foregoing reasons, the government requests permission to file its response to the defendant's second supplemental motion by 5:00 p.m. on Monday, July 30, 2018.

Respectfully submitted,

ROBERT S. MUELLER, III
Special Counsel

Dated: July 26, 2018

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CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of July, 2018, I will cause to be filed electronically the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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